

HON. JUDGE JAMAL N. WHITEHEAD

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

DIANE SIMKINS, decedent, by her
personal representative Kristi Simkins;
KRISTI SIMKINS and PATRIC ROGERS;
and CHRISTER PERSSON,

Plaintiffs,

v.

NEW YORK LIFE INSURANCE
COMPANY; and ILLUMIFIN
CORPORATION, a foreign profit
corporation,

Defendants.

No. 2:23-cv-00578-JNW

STIPULATED ORDER ON
DEFENDANT ILLUMIFIN
CORPORATION'S MOTION FOR
PROTECTIVE ORDER LIMITING
THE SCOPE OF 30(B)(6)
DEPOSITION

NOTE ON MOTION CALENDAR:
June 25, 2024

COME NOW, the parties, Plaintiffs Diane Simkins, decedent, by her personal representative, Kristi Simkins, Kristi Simkins, Patric Rogers, and Christer Persson ("Plaintiffs"), and Defendant illumifin Corporation ("illumifin") (together, the "Parties"), through their undersigned attorneys, and hereby stipulate to Defendant's illumifin Corporation's Motion for Protective Order Limiting the Scope of 30(b)(6) Deposition as follows:

The Plaintiffs will limit the following topics as indicated:

STIPULATED ORDER ON DEFENDANT
ILLUMIFIN CORPORATION'S MOTION
FOR PROTECTIVE ORDER
(No. 2:23-cv-00578-JNW) - 1

RUIZ & SMART LLP
901 Fifth Ave., Ste. 820
Seattle, WA 98164
Tel. 206-203-9100 Fax 206-785-1702

Topic 9	Plaintiffs will not inquire about specific education and training information for subject employees.
Topic 14	Plaintiffs withdraw.
Topic 16	Plaintiffs withdraw.
Topic 17	Plaintiffs will limit to January 1, 2016, to the present. illumifin has agreed to provide general information regarding the salaries and bonuses of these types of employees. The parties agree that illumifin will not be required to provide specific compensation information.
Topic 18	Plaintiffs withdraw.
Topic 21	illumifin will not produce documents on this topic. illumifin has agreed to designate a representative or representatives to testify who has knowledge of illumifin's general compensation plans including bonuses, compensation, incentives, or other incentives given or paid to claims representatives, claims managers or their supervisors from January 1, 2016 to the present.
Topic 23	Plaintiffs will not inquire about contents of personnel files.
Topic 24	Plaintiffs will not inquire relating to disciplinary history or the contents of any personnel file.

DATED: June 20, 2024

KELLER ROHRBACK L.L.P.

SHERMAN & HOWARD L.L.C.

By: s/Adam Rosenberg

Adam Rosenberg, WSBA #39256

Keller Rohrbach LLP

1201 Third Avenues, Suite 3200

Seattle, WA 98101

Telephone: (206) 623-1900

arosenberg@kellerrohrback.com

By: s/Melissa K. Reagan

Melissa K. Reagan (*Pro Hac Vice*)

Kellie Nelson Fetter (*Pro Hac Vice*)

675 Fifteenth Street, Suite 2300

Denver, Colorado 80202

Telephone: (303) 297-2900

mreagan@shermanhoward.com

Counsel for Plaintiffs

Counsel for illumifin Corporation

RUIZ & SMART LLP

**HILLIS CLARK MARTIN &
PETERSON, P.S.**

By: s/Isaac Ruiz

Isaac Ruiz, WSBA #35237

Ruiz & Smart LLP

901 Fifth Avenue, Suite 820

Seattle, WA 98164

Telephone: (206) 203-9011

iruiz@ruizandsmart.com

By: s/Melissa K. Reagan for

Alexander Wu, WSBA #40649

999 Third Avenue, Suite 4600

Seattle, WA 98104

Telephone: (206) 623-1745

alex.wu@hsmp.com

Counsel for Plaintiffs

Counsel for illumifin Corporation

ORDER

IT IS SO ORDERED.

In addition, Defendant Illumifin's motion for protective order, Dkt. No. 99, is stricken as moot without prejudice.

Dated this 21st day of June, 2024.



Jamal N. Whitehead
United States District Judge